

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
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UNITED STATES OF AMERICA

)

Case No. 05-1734-CHB

v.

)

CHRISTOPHER HENDRICKX,
Defendant

)

U.S. DISTRICT COURT
DISTRICT OF MASS.

)

**JOINT MOTION TO FURTHER ENLARGE THE TIME FOR THE FILING OF AN
INFORMATION OR INDICTMENT**

The United States of America, by Michael J. Sullivan, U.S. Attorney, and John M. Hodgens, Jr., Assistant U.S. Attorney, and Defendant, by his counsel Edward P. Ryan, Jr., Esq., jointly move the Court for an Order that enlarges the time for the filing of an Information or Indictment from November 3, 2004 until December 17, 2004, pursuant to 18 U.S.C. 3161(b) and 18 U.S.C. 3161(h)(8)(A) as the ends of justice in taking such action outweigh the best interest of the public and defendant in a speedy trial. As grounds, this is the fourth enlargement sought by the parties. The first enlargement was from July 30, 2004 to August 30, 2004. Additional time is required to: (1) pursue a possible resolution, pursuant to Fed. R. Crim. P. 11; (2) provide counsel with additional time to assemble information concerning Defendant; and 3) to allow time to determine the number of images

involved the conduct, a fact necessary for the application of adjustments under the Federal Sentencing Guidelines.

Agreed:

CHRISTOPHER HENDRICKX
Defendant

By:

John M. Hodgins Jr.
Edward P. Ryan, Esq.

Respectfully submitted,

MICHAEL J. SULLIVAN
UNITED STATES ATTORNEY

By:

John M. Hodgins Jr.
JOHN M. HODGENS, JR.
Assistant U.S. Attorney

ss., Worcester

CERTIFICATE OF SERVICE

I, John M. Hodgins, Jr., Assistant U.S. Attorney, hereby certify that a copy of the foregoing was served by ~~fax~~/mail upon Edward P. Ryan, Jr., Esq., on this the 21st of October, 2004.

John M. Hodgins Jr.
JOHN M. HODGENS, JR.
Assistant U.S. Attorney